

## **I. RESOURCES**

### **A. County Resources:**

Glenn County has six licensed biologists and historically devoted approximately 3.2 positions (5760 certified hours in FY 2009/10) per year to the Pesticide Enforcement Program.

Workload Expectation- will be equal to our 2009/10 fiscal year accomplishments.

Workload expectations include:

- 50 property operator application inspections
- 40 pest control business application inspections
- 5 structural operator inspections
- 5 field worker inspections
- 30 property operator mix/load inspections
- 30 pest control business mix/load inspections
- 5 commodity and 5 field fumigation inspections
- 20 property operator headquarter inspections
- 2 dealer inspections
- 3 pest control operator record inspections
- 5 advisor record inspections
- Minimum of 5 % pre application site inspections at an estimated 235 inspections.

Expected Program Changes- we are seeing orchard crop acreage increasing in the County therefore we will shift some focuses from field crops (rice in particular) to the orchard crops for compliance criteria. The Rice Water Hold program is still a priority but applications are not as prevalent due to reduced pesticide use.

## **II. CORE PROGRAM ACTIVITIES**

### **A. Restricted Material Permitting;**

Glenn County currently uses the AgGIS Restricted Materials Permit Program (RMPP). This has allowed us to develop high-quality aerial photograph-based maps for sites, better defining proposed use sites and surrounding environment. Greater than 95% of the sites have been digitized in this system.

Newly identified hazards are mitigated by addressing established guidelines and programs developed by U.S. EPA, DPR and County Ag Commissioners. Also, the County usually develops a document (handout) that defines the hazard and how to mitigate it. This is shared with the permittee either at the time of permit issuance, when the NOI is given, sometimes the document is mailed or we share it at workshops. During fiscal year 2011/12, our office expects to transition to the new permit system.

## **B. Compliance Monitoring**

### **1. Inspections-**

#### Strategy:

Inspections are conducted by staff on both a random basis and a focused basis as identified by our program management team and DPR. Management has developed inspection goals (numbers) based, in part, on previous years inspections which have identified problem areas or compliance weaknesses.

The use of personal protective equipment (PPE) by grower-employees is an area where we have seen some non-compliances. We will increase inspections in orchard crops and will consider increased enforcement actions for PPE violations as called for under the enforcement response regulation. For fiscal year 2010/11 we propose to focus more on the use minimal exposure pesticides, particularly propargite. In 2010, 85 applications of Omite 30WS or Comite were reported, most of which were used in almonds and walnuts from mid-July through early August and field crops in June.

At least 25% of our “Headquarter Inspections” will be in follow-up to use monitoring inspections where non-compliance(s) with PPE requirements are identified. We expect to initiate these follow up inspections within 30 days of the original inspection. Discussions with our DPR Enforcement Branch Liaison (EBL) are also used to help us identify and address statewide goals and concerns. Inspections will continue to be focused in areas where past inspections have identified increased non-compliances. Management will continue to review past inspection records to identify possible increased inspection areas.

Beginning fiscal year 2010/11 we will revise our approach to conducting pest control adviser (PCA) records reviews. We propose to reduce the annual number of PCA reviews from 10 to 5. Inspection staff will be assigned to review PCA recommendations during the course of the use season as part of the pre-application site evaluation process focusing on reviewing those recommendations made by a particular PCA.

#### Goals and Objectives:

We will utilize assistance from our EBL for training and guidance in these inspections. We will conduct follow-up activities within 60 days of the initial non-compliance. To continue improving our program, we will analyze the results of our inspections, illness and episode investigations and will use other feedback from DPR and the public. In addition, we will use this information to design focused training outreach.

We will commit to work with our EBL to review and evaluate our program effectiveness throughout the duration of this work plan to ensure improvements are continually made in our site monitoring prioritization and enforcement activities.

## **2. Investigation Response and Reporting**

Investigation Response and Reporting Improvement: We will evaluate our investigation response and reports and will implement program improvements. This includes the timely initiation and completion of non-priority episode investigations. We will begin our investigation of all incidents within 48 hours of receipt with a target of 60 days for completion and submission to DPR.

We will make available to our assigned Enforcement Branch Liaison a log that covers episode investigations not already reported or tracked as a priority episode investigation or pesticide illness. The log will include the following information:

1. County name;
2. Month;
3. Tracking number or file name;
4. Pesticide(s) involved in the episode;
5. Type of episode;
6. Episode location within the county;
7. If violations were found
8. Date investigation was closed.

Priority episode investigation and reporting: We will adhere to the guidelines that DPR has established for priority investigations.

Development and use of investigation plans: We will use DPR's guidance for conducting investigations.

Thorough report preparation: We will submit reports that meet DPR's criteria for completion and will work with our Enforcement Branch Liaison in to ensure complete reports.

### **C. Enforcement Response;**

#### **1. Violation history tracking**

When a violation is noted during an inspection, the inspecting biologist reviews the firm/person's compliance file for previous violations and reviews this information with the PUE program manager within (5) five days of the incident.

#### **2. Implementation Process**

Our goal is that compliance and enforcement actions will be completed and turned into the PUE program manager within fourteen (14) days of the decision to take the action. Additionally, all enforcement actions for "Class A & B" violations are reviewed by the DPR EBL prior to being mailed to the respondent. After consultation with the DPR EBL enforcement actions are again reviewed by the assistant and, if satisfactory forwarded to the commissioner for the final determination.

Goals and Objectives:

The goal of the enforcement response plan is to provide a timely, fair and consistent response to non-compliances and to:

- Prioritize our efforts toward the violations most likely to cause harm to people and the environment.
- Promote the notion that the most serious violations should draw the most serious penalties.
- Promote future compliance by the grower/regulated business community.